

Geoffrey C. Gould  
Vice President  
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**GTE Corporation**

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June 29, 2000

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street lobby, TW-A325  
Washington, DC 20554

RECEIVED  
JUN 29 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: GTE Certification of Interstate Access Universal Service Support, CC  
Docket No. 96-262, 94-1, 99-249, and 96-45**

Dear Ms. Salas:

GTE Service Corporation, on behalf of its affiliated domestic telephone operating companies ("GTE"), hereby certifies that all interstate access universal service support provided to GTE pursuant to Part 54.807 of the Commission's Rules will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. That is, to make explicit support that was previously implicit in interstate access rates, and to keep subscriber line charges associated with local telephone service affordable.

GTE is an eligible telecommunications carrier (ETC) consistent with section 254(e) of the Telecommunications Act of 1996. A listing of GTE Operating Companies with ETC status is being provided for which this certification applies.

Sincerely,

Geoffrey C. Gould  
Vice President – Government & Regulatory Affairs  
GTE Corporation

Attachment:

cc: Robert Haga – Universal Service Administrative Company

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List ABCDE

# GTE Network Services

As of June 30, 2000

Attachment I

## ETC Study Areas

## NECA CODE

## COSA CODE

1	Alabama	250293	GTAL
2	Alabama (Contel)	250281	COAL
3	Alaska	613009	GTAK
4	Arkansas	402080	GTAR
5	Arkansas (Contel)	401730	COAR
6	Arkansas (KS DBA AR)	401790	COSA
7	California	542319	GTCA
8	California - Arizona (Contel)	452302	COAZ
9	California - Nevada (Contel)	552302	CONV
10	California (Contel)	542302	COCA
11	California (West Coast)	542344	GNCA
12	Florida	210328	GTFL
13	Hawaii	623100	GTHI
14	Idaho	472416	GTID
15	Illinois	341015	GTIL
16	Illinois (Contel)	341036	COIL
17	Illinois (GSI)	343035	GLIL
18	Indiana	320772	GTIN
19	Indiana (Contel)	320779	COIN
20	Indiana (CSI)	323034	GLIN
21	Iowa	351186	GTIA
22	Iowa (Contel)	351207	COIA
23	Iowa (KS DBA IA)	351790	COSI
24	Kentucky	260407	GTKY
25	Kentucky (Contel)	260410	COKY
26	Michigan	310695	GTMI
27	Michigan (CSI)	313033	GLMI
28	Micronesia Tel.	653700	GTMC
29	Minnesota	361186	GTMN
30	Minnesota (Contel)	361140	COMN
31	Missouri	421186	GTMO
32	Missouri - Eastern (Contel)	421789	COEM
33	Missouri (Contel)	421922	COMO
34	Missouri (C.S.)	421846	COCM
35	Nebraska	371186	GTNE
36	New Mexico	492080	GTNM
37	New Mexico (Contel)	492177	CONM
38	North Carolina	230479	GTNC
39	North Carolina (Contel)	230509	CONC
40	Ohio	300615	GTOH
41	Oklahoma	432080	GTOK
42	Oregon	532416	GTOR
43	Pennsylvania	170169	GTPA
44	Pennsylvania (Contel QS)	170201	COQS
45	Pennsylvania (Contel)	170170	COPA
46	South Carolina	240479	GTSC
47	South Carolina (Contel)	240526	COSC
48	Texas	442080	GTTX
49	Texas (Contel)	442154	COTX
50	Virginia	190479	GTVA
51	Virginia (Contel)	190233	COVA
52	Washington	522416	GTWA
53	Washington (Contel)	522449	COWA
54	Wisconsin	330886	GTWI

Gail L. Polivy  
Assistant General Counsel



**GTE Service Corporation**

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Ms. Magalie R. Salas  
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Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: GTE Request for Confidential Treatment of CALLS Line Count Data  
Provided to USAC, CC Docket Nos. 96-262, 94-1, 99-249, and 96-45**

Dear Ms. Salas:

GTE Service Corporation, on behalf of its affiliated domestic telephone operating companies ("GTE"), pursuant to Section 0.459 of the Commission's Rules, 47 C.F.R. §0.459, requests that wire-center (WC) line counts summarized by UNE zone GTE is providing to USAC on June 30, 2000 not be made routinely available for public inspection. Pursuant to the Commission's *Sixth Report and Order in the matter of Access Price Reform*, GTE must submit WC line count data for each of its UNE zones to USAC for the CALLS Program on June 30, 2000 and each quarter thereafter.

The information submitted in the Confidential version contains trade secrets or commercial or financial information that is confidential and disclosure to the public would likely cause competitive injury to GTE. See 5 U.S.C. §552(b)(4); *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765 (D.C. Cir. 1974); *National Parks and Conservation Ass'n v. Kleppe*, 547 F.2d 673 (D.C. Cir. 1976). The submission provided to USAC contains detailed information of GTE's facilities including highly sensitive information used in GTE's business plans. Disclosure of this information at the level of particular zone / wire center would reveal proprietary business information and would cause competitive harm to GTE. Competitors or potential competitors could use the information to evaluate operational and business plans. Disclosure of this information could undermine GTE's business interests and

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<sup>1</sup> *Sixth Report and Order in CC Docket Nos. 96-262, 94-1 Report and Order in CC Docket No. 99-249, and Eleventh Report and Order in CC Docket No. 96-45, FCC 00-193, released May 31, 2000.*

could have a significant, long-term, negative impact on the ability of GTE to effectively compete in its marketplace.

The Commission has previously recognized the proprietary nature of wire center specific line count data and has treated similar data submissions as confidential and protected from public disclosure.<sup>2</sup>

Accordingly, GTE asks that WC line count data by UNE zone provided to USAC be treated under the Commission's Rules as confidential.

Sincerely,



Gail L. Polivy  
Attorney for GTE Service Corporation

cc: Katie King – Accounting Policy Division, 5-B550  
John Ricker – USAC – Whippany, NJ

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<sup>2</sup> See, e.g., *Order*, Federal-State Joint Board on Universal Service, CC Docket Nos. 96-45, 97-160, DA 99-1406 at ¶8, released Jul. 19, 1999.

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Thursday, June 29, 2000

01) REPLY

Document Date : 6/27/00

2000 Annual Access Tariff Filings

Filed By :

Iowa Telecommunications Services  
SBC  
Roseville Telco  
BellSouth  
NECA

02) COMMENTS

Document Date : 6/26/00

Docket # : CC 98-147 : Deployment of wireline services

Filed By :

CPI  
Covad Communications

03) EMERGENCY MOTION FOR STAY

Document Date : 6/27/00

Petition for an Order directing the NANP administrator to assign NXX codes in Connecticut to Global Crossing Local Services

Filed By :

Global Crossing  
Global Crossing - petition

04) COMMENTS

Document Date : 6/27/00

Echostar Satellite Corporation application for authority to make minor modifications to DBS authorizations

Filed By :

State of Alaska

ORDERS

05) FCC MEMORANDUM OPINION AND ORDER (DA 00-1452)

Docket # : NSD-L-00-46 : SWBell petitions for limited modification of LATA boundary to provide ELCS

Document Date : 6/29/00 between Blessing and El Campo in TX

06) FCC MEMORANDUM OPINION AND ORDER (DA 00-1453)

Document Date : 6/29/00

Docket # : NSD-L-00-47 : SWBell petition for limited modification of LATA boundary to provide ELCS between Laneville and Nacogdoches, TX

## PUBLIC NOTICES

### 07) FCC PUBLIC NOTICE

Document Date : 6/29/00

Tariff Transmittal Public Reference Log

### 08) FCC PUBLIC NOTICE

Document Date : 6/29/00

Docket # : CC 92-237 : FCC announces next meeting of North American Numbering Council - 7/18/00

### 09) FCC PUBLIC NOTICE (DA 00-1451)

Document Date : 6/29/00

Docket # : ETC 00-22 : 4-DTV seeks determination of ETC status

Comments 07/19/2000

Replies: 07/26/2000

### 10) FCC PUBLIC NOTICE (DA 00-1450)

Document Date : 6/29/00

Docket # : ETC 00-21 : Reese Telecommunications seeks determination as ETC

Comments 07/19/2000

Replies: 07/26/2000

### 11) FCC PUBLIC NOTICE (DA 00-1457)

Document Date : 6/29/00

Foreign Carrier Affiliation notification

### 12) FCC PUBLIC NOTICE (DA 00-1456)

Document Date : 6/29/00

DIRECTV application to launch DBS space station

### 13) FCC PUBLIC NOTICE (DA 00-1449)

Document Date : 6/29/00

Due Diligence Announcement for upcoming 800 MHz spectrum auctions